

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KERRY ASHDOWN,

Plaintiff,

v.

13 CV 1374 (HB)(GWG)

EQUINOX *a/k/a*
EQUINOX FITNESS CLUB *and incorporated as*
EQUINOX HOLDINGS, INC.,
MAURO MAIETTA,
LAWRENCE SANDERS,
MATT PLOTKIN *a/k/a* MATTHEW PLOTKIN,

**DECLARATION OF
WALKER G. HARMAN, JR.**

Defendants.

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WALKER G. HARMAN, JR. declares that the following is true and correct:

1. I am an attorney duly admitted to practice in the United States District Court for the Southern District of New York.
2. I am the principal attorney at The Harman Firm, PC, which represents Plaintiff Kerry Ashdown in the above-captioned action. As such, I am fully familiar with the facts and circumstances of the matter, the basis of my knowledge being the files maintained by our office and time working on the above-captioned action with my office and with Ms. Ashdown.
3. Attached as *Exhibit A* is a true copy of the Second Amended Complaint, filed May 5, 2013.
4. Attached as *Exhibit B* is a true copy of the Transcript of the Deposition of Ms. Ashdown, which was taken August 27, 2013.
5. Attached as *Exhibit C* is a true copy of the Transcript of the Deposition of Defendant, Joseph Matarazzo, which was taken August 28, 2013.

6. Attached as *Exhibit D* is a true copy of Transcript of the Deposition of Defendant, Mauro Maietta, which was also taken September 10, 2013.

7. Attached as *Exhibit E* is a true copy of the Transcript of the Deposition of Defendant, Lawrence Sanders, which was taken September 12, 2013.

8. Attached as *Exhibit F* is a true copy of the Transcript of the Deposition of Defendant, Matt Plotkin, which was taken October 8, 2013.

9. I declare under penalty of perjury that the foregoing facts are known by me to be true and correct of my own knowledge.

Dated: New York, New York
November 8, 2013

Respectfully submitted by:
THE HARMAN FIRM, PC
Counsel for Plaintiff

s/
Walker G. Harman, Jr. [WH-8044]
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